



# South Coast Air Quality Management District

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**E-MAILED: APRIL 11, 2008**

April 11, 2008

Dr. Ralph Appy  
Director of Environmental Management Division  
Port of Los Angeles  
425 S. Palos Verdes Street  
San Pedro, CA 90731

Dear Dr. Appy:

## **Notice of Preparation of a Draft Environmental Impact Report for the Wilmington Waterfront Development Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. This letter is in addition to the previous comment letter dated March 19, 2008. One of the objectives described in the Notice of Preparation (NOP) is to attract visitors to the waterfront in Wilmington. The SCAQMD staff understands the desire of the community to develop more recreational space near the Port, however, the location of this proposed project is in an area currently experiencing cancer risks of 1,000 in a million, according to the California Air Resources Board.<sup>1</sup> Furthermore, the draft Multiple Air Toxics Exposure Study III (MATES III), a monitoring and evaluation study most recently conducted in the South Coast Air Basin by SCAQMD, confirms the highest cancer risks are found near the Port region ranging from 1,100 to 2,900 in a million.<sup>2</sup> Port activities are a major source of diesel particulate matter (PM).

The SCAQMD staff is concerned about siting the proposed Wilmington Waterfront Development Project at or near the area of the Port with the most elevated health risk. According to the California Air Resources Board's (ARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, siting new sensitive land uses immediately downwind of Port operations should be avoided.<sup>3</sup> Furthermore, the ARB Handbook is critical on siting sensitive land uses next to industrial facilities such as power plants, noting facility specific information should be obtained and analyzed prior to the sensitive land use decision. The NOP states that the sensitive receptors visiting the proposed project may be exposed to existing and projected toxic air contaminants from Port operations and commits to addressing these health impacts in the Draft Environmental Impact Report (Draft EIR). The SCAQMD staff recommends the Lead

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<sup>1</sup> California Air Resources Board, April 2006. "Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach." Accessed at <http://www.arb.ca.gov/regact/marine2005/portstudy0406.pdf>

<sup>2</sup> Draft Multiple Air Toxics Exposure Study in the South Coast Air Basin (Mates III), January 2008. Accessed at <http://www.aqmd.gov/prdas/matesIII/matesIII.html>

<sup>3</sup> California Air Resources Board, April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at <http://www.arb.gov/ch/landuse.htm>

Agency quantify the cancer risk at the proposed Wilmington Waterfront Development location so it is clear to the public the potential health impacts.

This proposed project should be an incentive to the Port to expedite implementation of all measures contained in the San Pedro Bay Port's Clean Air Action Plan. Considering the anticipated growth in goods movement, major emission reductions are needed from Port operations including trucks, terminal equipment, ships, and locomotives. Implementation of measures to reduce diesel PM should coincide with the development of the proposed project to ensure adequate public health protection.

The SCAQMD staff appreciates the opportunity to comment on this project. If you have any questions, please call Edward Kim at (909) 396-2323 or me at (909) 396-3105.

Sincerely,



Susan Nakamura  
Planning Manager

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